

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
MYSTERY NICOLE SCHAPPELL	:	
Debtor	:	CASE NO. 1:23-bk-00051
	:	
ISAAC & CHEYENNE PAULEY	:	ADVERSARY NO.
Plaintiff(s)/Movant(s)	:	
vs.	:	Nature of Proceeding Motion for Relief
	:	
MYSTERY NICOLE SCHAPPELL	:	
Defendant/Respondent	:	Document #:

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE ¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance².

Reason for the continuance. Debtor's counsel will be out of town the week of June 5th, 2023. Counsel for Movant, S. Wade Parker, has agreed to the continuance request.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: June 1, 2023

/s/ Kara K. Gendron
Kara K. Gendron, Esquire
Attorney ID 87577
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
karagendron@gmail.com

¹ No alterations or interlineations of this document are permitted.

² If this is not a first request for a continuance, then a Motion to Continue must be filed.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN THE MATTER OF
MYSTERY NICOLE SCHAPPELL**

:
:
:
:
:

CHAPTER: 13

CASE NUMBER:1:23-bk-00051

Debtor(s)

CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on June 1, 2023 I served a copy of the Request to Continue on the following parties:

Name and Address	Mode of Service
S. Wade Parker, Esquire wparker@etzweilerwithers.com counsel for Movants ISAAC & CHEYENNE PAULEY	Electronically
JACK N. ZAHAROPOULOS STANDING CHAPTER 13 TRUSTEE 8125 ADAMS DRIVE, STE A HUMMELSTOWN, PA 17036	Electronically

I certify under penalty of perjury that the foregoing is true and correct.
Date: 06/01/2023

/s/ Kara K. Gendron
Kara K. Gendron, Esquire
Attorney ID 87577
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
karagendron@gmail.com